

Marcus A. Helt (TX 24052187)
Thomas C. Scannell (TX 24070559)
Stephen A. Jones (TX 24101270)
FOLEY & LARDNER LLP
2021 McKinney Avenue, Suite 1600
Dallas, Texas 75201
Telephone: (214) 999-3000
Facsimile: (214) 999-4667
mhelt@foley.com
tscannell@foley.com
sajones@foley.com

**COUNSEL FOR THE DEBTORS
AND DEBTORS-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re: § Chapter 11
§
SPHERATURE INVESTMENTS LLC, § Case No.: 20-42492
et al. §
§
§
Debtors.¹ § Jointly Administered

AGREED MOTION TO CONTINUE MARCH 25, 2021 HEARING

Spherature Investments LLC (“**Spherature**”), together with its affiliates identified herein, as debtors and debtors-in-possession (collectively, the “**Debtors**”), hereby file this *Agreed Motion to Continue March 25, 2021 Hearing* (the “**Motion to Continue**”). In support of the Motion to Continue, the Debtors respectfully state as follows:

¹ The “**Debtors**” in the above-captioned jointly administered chapter 11 bankruptcy cases (“**Cases**”) are: Spherature Investments LLC EIN#5471; Rovia, LLC EIN#7705; WorldVentures Marketing Holdings, LLC EIN#3846; WorldVentures Marketplace, LLC EIN#6264; WorldVentures Marketing, LLC EIN#3255; WorldVentures Services, LLC EIN#2220.

I.
RELIEF REQUESTED

1. On December 21, 2020 (the “**Petition Date**”), the Debtors filed their respective voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”), thereby initiating the above-captioned cases (the “**Cases**”).
2. On December 22, 2020, the Debtors filed their *Emergency Motion for an Interim and Final Orders Granting Use of Cash Collateral and Scheduling Final Hearing* (the “**Cash Collateral Motion**”) [Docket No. 18].
3. On January 21, 2021, the Debtors filed their *Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Bid Protections; and (C) Form and Manner of Notices; (II) Scheduling and Auction and Sale Hearing; (III) Approving the Sale of Substantially All the Assets of the Debtors, Free and Clear of All Liens, Claims, Encumbrances and Interests; (IV) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases; and (V) Granting Related Relief* (the “**Bid Procedures Motion**”) [Docket No. 92].
4. On February 9, 2021, the Official Committee of Unsecured Creditors (the “**Committee**”) filed their *Motion of the Official Committee of Unsecured Creditors for an Order Clarifying the Requirements to Provide Access to Confidential or Privileged Information* (the “**Committee Information Motion**”) [Docket No. 125].
5. The Honorable Brenda T. Rhoades, Bankruptcy Judge for the United States Bankruptcy Court for the Eastern District of Texas (the “**Court**”) set the Cash Collateral Motion, Bid Procedures Motion, and Committee Information Motion for a hearing (the “**Hearing**”) on March 25, 2021 at 1:30 PM (CT).

6. Counsel for the Debtors respectfully request that the Hearing scheduled for March 25, 2021 at 1:30 PM be continued and rescheduled for April 6, 2021 at 2:30 PM (CT), or another date and time of the Court's convenience. This Motion to Continue is not made for delay purposes, but in order to promote efficiency and that justice might be served. Counsel for the Debtors have conferred with counsel for the secured lenders, counsel for the Committee, and counsel for the putative stalking horse bidder, and all parties consent to the continuance requested herein.

II.
NOTICE

7. No trustee, examiner, or committee has been appointed in these Cases. This Motion to Continue has been provided to: (i) the Office of the United States Trustee; (ii) to each of the Debtors' secured lenders; (iii) counsel to the agents of the Debtors' secured lenders; (iv) counsel to the Official Committee of Unsecured Creditors; (v) the forty (40) largest unsecured creditors of each the Debtors, as applicable; (vi) the Internal Revenue Service; and (vii) all parties in interest who have formally appeared and requested notice. The Debtors respectfully submit that no further notice of this Motion is required.

8. The pleadings in these Chapter 11 Cases and supporting papers are available on the Bankruptcy Court's website at <https://ecf.txeb.uscourts.gov/> and on the Debtors' claims agent's website at <https://cases.stretto.com/Spherature>. You can also request any pleading you need from the Debtors' counsel at: Foley & Lardner LLP, c/o Thomas C. Scannell, 2021 McKinney Avenue, Suite 1600, Dallas, Texas 75201 (tscannell@foley.com).

III.
CONCLUSION

WHEREFORE, the Debtors respectfully request the Court (1) reschedule and continue the Hearing on the Cash Collateral Motion, Bid Procedures Motion, and Committee Information

Motion to April 6, 2021 at 2:30 PM (CT), or another date and time of the Court's convenience, and (2) grant such other relief to which the Debtors may be entitled.

DATED: March 23, 2021

Respectfully submitted:

/s/ Marcus A. Helt

Marcus A. Helt (TX 24052187)
Thomas C. Scannell (TX 24070559)
Stephen A. Jones (TX 24101270)
FOLEY & LARDNER LLP
2021 McKinney Avenue
Suite 1600
Dallas, Texas 75201
Telephone: (214) 999-3000
Facsimile: (214) 999-4667
mhelt@foley.com
tscannell@foley.com
sajones@foley.com

**COUNSEL FOR THE DEBTORS
AND DEBTORS-IN-POSSESSION**

CERTIFICATE OF SERVICE

I hereby certify that, on March 23, 2021, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Stephen A. Jones
Stephen A. Jones